

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**JOINT STATUS REPORT**

Consistent with the Court's Order in Docket No. 241 (Feb. 25, 2024), the Parties submit this joint status report covering the issues the Parties wish to discuss at the upcoming status conference.

**I. THE STATES' MOTION TO LIFT STAY**

On March 8, 2024, the Plaintiff States filed their Motion to Lift the Discovery Stay related to the Network Bidding Agreement (ECF No. 288). On March 12, 2024, the Court ordered expedited briefing on the Motion, with Google filing its response by March 15 and the States filing their reply by March 19. If the Court wishes to hear argument on the Motion, the Parties will be prepared to address it at the upcoming March 21, 2024 Conference.

**II. THE COORDINATION ORDER WITH THE MDL**

The Parties will be prepared to address the status of the coordination order of this case and the MDL case pending before Judge Castel, following Judge Castel's March 6, 2024 Pre-trial Order No. 8 denying the Parties' request to coordinate discovery with this action. Ex. A. The Parties will meet before the March 21, 2024 Conference and will determine if there are areas

related to coordination that needs to be discussed and if any are ripe for the March 21, 2024 Conference.

### **III. THE STATES' INTERROGATORY RESPONSES**

At a recent hearing before the Special Master, in discussing their interrogatory responses, Plaintiffs represented that except for Puerto Rico, they no longer seek damages, disgorgement, and restitution for state law claims. 3/7/24 Special Master Hr'g Tr. at 80:10-21. Plaintiffs have promised amended interrogatory responses tomorrow that reflect this change. Google will evaluate those amended responses and bring any issues to the Court's attention as needed.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that, on March 14, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ W. Mark Lanier  
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